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VIA ECF & FACSIMILE (212) 805-7986

Hon. Paul G. Gardephe
United States District Court
Southern District of New York
40 Centre Street
New York, New York 10007

Re: *Grant v. Warner Music Group Corp. et al*, No. 13 Civ. 4449;
Henry v. Warner Music Group Corp., et al, No. 13 Civ. 5031

Your Honor:

This firm represents the defendants in the above referenced actions. On behalf of all parties, I write to respectfully request a 30-day extension on the date for the plaintiffs to file documents in support of their motion for preliminary approval of the parties' settlement agreement.

On January 22, 2015, counsel for plaintiffs filed a letter advising the Court of the status of settlement negotiations, and requesting a 45-day extension of time in which to file documents in support of their motion for preliminary approval. (See Docket, Document 85.) The Court granted that request on January 29, 2015. (See Docket, Document 86.) In the time since then, certain unanticipated logistical challenges have presented themselves which compel counsel for the parties to request an additional 30-day extension, which we anticipate will be adequate to address those outstanding issues. We respectfully request that the filing deadline for the plaintiffs' motion for preliminary approval be extended to Wednesday, April 8, 2015.

We thank the Court in advance for its attention to this request.

Very truly yours,

Davis Wright Tremaine LLP

Michael Goettig

A handwritten signature in black ink, appearing to read 'Michael Goettig', written over a horizontal line.